

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NAULTY, SCARICAMAZZA & McDEVITT, LTD.
BY: SEAN P. BUGGY, ESQUIRE
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(215) 568-5116

ATTORNEY FOR DEFENDANTS,
EHS Environmental, Inc., & Environmental
Hazard Services, Inc.

Executive Car Wash of Maple Glen

v.

EHS Environmental, Inc., & Environmental
Hazard Services

v.

Atlantic Petroleum Technologies

United States District Court
Eastern District of Pennsylvania

NO. 02-3747

ORDER

Upon consideration of the Motion of Defendants, EHS Environmental, Inc., & Environmental Hazard Services, Inc. to Compel Plaintiff's Deposition and Responses to Interrogatories and Request for Production of Documents pursuant to Local Rule 26.1(g) of the Local Rules of the United States District Court for the Eastern District of Pennsylvania, it is hereby **ORDERED AND DECREED** that Plaintiff, Executive Car Wash of Maple Glen, shall appear for deposition as duly noticed by defendants and provide Answers to Interrogatories and Request for Production of Documents within twenty (20) days.

BY THE COURT:

J.

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**MOTION OF DEFENDANTS, EHS ENVIRONMENTAL, INC., & ENVIRONMENTAL
HAZARD SERVICES, INC., TO COMPEL PLAINTIFF'S DEPOSITION AND DISCOVERY
RESPONSES TO LOCAL RULE 24(g)**

Pursuant to Local Rule 24(g) of the Local Rules of the United States District Court for the Eastern District of Pennsylvania, Defendants, EHS Environmental, Inc., & Environmental Hazard Services, Inc., hereby move this Court for an Order requiring Plaintiff to appear for deposition and provide Answers to Interrogatories and Request for Production of Documents and in support thereof avers as follows:

1. On June 19, 2003, Defendants, EHS Environmental, Inc., & Environmental Hazard Services, Inc., served Requests for Interrogatories and a Request for Production of Documents upon the Plaintiff.
2. As of this date, Plaintiff has not provided any responses or objections to the discovery propounded on June 19, 2003.
3. As of this date, Plaintiff has not submitted to deposition.
4. The discovery deadline is July 28, 2003.

WHEREFORE, Defendants, EHS Environmental, Inc., & Environmental Hazard Services, Inc., respectfully request that this Court Order Plaintiff to appear for deposition and provide Answers to Defendants' Requests for Interrogatories and Request for Production of Documents within twenty (20) days.

NAULTY, SCARICAMAZZA & McDEVITT, LTD.

BY: _____
Sean P. Buggy, Esquire
Attorney for Defendants,
EHS Environmental, Inc., & Environmental
Hazard Services, Inc.

CERTIFICATION OF COUNSEL

I, SEAN P. BUGGY, ESQUIRE, counsel for Defendants, EHS Environmental, Inc., & Environmental Hazard Services, Inc. herein, certify that after reasonable effort counsel for the respective parties are unable to resolve the dispute regarding Plaintiff's outstanding discovery responses.

NAULTY, SCARICAMAZZA & McDEVITT, LTD.

BY: _____
Sean P. Buggy, Esquire
Attorney for Defendants,
EHS Environmental, Inc., & Environmental
Hazard Services, Inc.

CERTIFICATION OF SERVICE

I, SEAN P. BUGGY, ESQUIRE, hereby certify that I served a copy of Defendants' Motion to Compel depositions and Answers to Defendants' Requests for Interrogatories and Request for Production of Documents upon counsel for the Plaintiff by United States Mail, First Class Postage Prepaid addressed as follows:

Steven Kapustin, Esquire
350 Sentry Parkway, Building 640
Blue Bell, PA 19422

NAULTY, SCARICAMAZZA & McDEVITT, LTD.

Date

BY: _____
Sean P. Buggy, Esquire
Attorney for Defendants,
EHS Environmental, Inc., & Environmental
Hazard Services, Inc.

VERIFICATION

I, Sean P. Buggy, Esquire, hereby verify that I am the attorney for the Defendants, EHS Environmental, Inc., and Environmental Hazard Services, Inc., and that the facts set forth in the foregoing pleading are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Sean P. Buggy, Esquire
Attorney for Defendants,
EHS Environmental, Inc., and Environmental
Hazard Services, Inc.